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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA, ) 2:17-CV-344  
11 Plaintiff, )  
12 v. )  
13 \$417,073.00 IN UNITED STATES ) United States' Unopposed Application To  
14 CURRENCY seized from the premises of ) Continue CAFRA Deadline  
2656 North Ontario Street, Las Vegas )  
Nevada; )  
15 \$28,230.05 IN UNITED STATES )  
16 CURRENCY seized from J.P. Morgan )  
Chase Account No. xxxxxxxx2849; )  
17 \$21,146.37 in UNITED STATES )  
18 CURRENCY seized from J.P. Morgan )  
Chase Bank Account No. xxxxxx5561; )  
19 Defendants. )

20 COMES NOW The United States of America and moves this Court to extend the  
21 CAFRA (Civil Asset Forfeiture Reform Act) deadline for 60 days or until April 11, 2017.  
22 This motion is unopposed by Claimants' Counsel.

23 Pursuant to 18 U.S.C. 983 (a)(2)(E), the United States has 90 days to file a civil  
24 complaint, if an interested party files a timely administrative claim with the seizing  
25 agency. In this case, Customs and Border Patrol seized the above referenced defendants  
26 on August 17, 2016; and the claimants, Zalmai and Sona Basharyar, filed administrative

1 claims with the Department of Homeland Security (United States Customs and Border  
2 Patrol) on November 10, 2016. As such, the United States was/is obliged to file a civil  
3 complaint by February 10, 2017.

4 The Government requests a continuance of that February 10, 2017, deadline until  
5 April 10, 2017. For its grounds the Government states that it continues to investigate this  
6 case, involving the seizure of large quantities of analogue drugs ("spice") from the  
7 business premises of G-One Smoke Shop as well as over \$450,000.00 in monetary assets  
8 (specified in the caption above) from the residential premises of the owner of that smoke  
9 shop (Zalmai Basharyar) and bank accounts linked to Basharyar, personally, and/or  
10 corporate bank accounts maintained by G-One. Government investigators have yet to  
11 complete their analysis of what will largely, if not exclusively, be a financial case, to wit:  
12 was/is the seized currency derived from legitimate sources or from drug-dealing. To  
13 resolve that issue, investigators need to pore over volumes of financial documents and  
14 bank records. Their task is not yet complete and, as such, the Government cannot make  
15 an informed assessment of whether there exists a preponderance of evidence that would  
16 justify filing a civil complaint.

17 Accordingly, the United States requests an additional 60 days (or until April 11,  
18 2017) to complete its financial analysis and determine whether to file a complaint in this  
19 matter.

20 Counsel for the Government has consulted with the Claimants' counsel, Gabriel  
21 Grasso, and he has authorized Government counsel to represent to this Court that he does  
22 not object to this motion.

23 This motion is not submitted solely for the purpose to delay or for any other  
24 improper purpose.

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1 WHEREFORE, for all of the reasons stated above, the United States moves this  
2 Court to continue the CAFRA deadline sixty (60) days or until April 11, 2017.

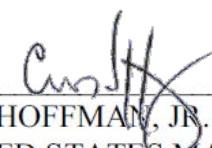
3 Dated: February 3, 2017

4 DANIEL G. BOGDEN  
5 United States Attorney

6 */s/ Michael A. Humphreys*  
7 MICHAEL A. HUMPHREYS  
8 Assistant United States Attorney

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14 IT IS SO ORDERED.

15 DATED: February 7, 2017

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18 C.W. HOFFMAN, JR.  
19 UNITED STATES MAGISTRATE JUDGE  
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